

1 GARMAN TURNER GORDON LLP
 2 GREGORY E. GARMAN
 3 Nevada Bar No. 6654
 4 E-mail: ggarman@gtg.legal
 5 GERALD M. GORDON
 6 Nevada Bar No. 229
 7 E-mail: ggordon@gtg.legal
 8 MARK M. WEISENMILLER
 9 Nevada Bar No. 12128
 10 E-mail: mweisenmiller@gtg.legal
 11 650 White Drive, Suite 100
 12 Las Vegas, Nevada 89119
 13 Telephone (725) 777-3000
 14 Facsimile (725) 777-3112
 15 *[Proposed] Attorneys for Debtor*

16 COZEN O'CONNOR
 17 THOMAS J. FRANCELLA
 18 Delaware Bar No. 3835
 19 *Pro Hac Vice Pending*
 20 E-mail: tfrancella@cozen.com
 21 1201 North Market Street, Suite 1001
 22 Wilmington, DE 19801
 23 Telephone: 302.295.2000
 24 Toll Free Phone: 888.207.2440
 25 Facsimile: 302.295.2013
 26 *[Proposed] Attorneys for Debtor*

17 **IN THE UNITED STATES BANKRUPTCY COURT**
 18 **FOR THE DISTRICT OF NEVADA**

19 In re:

20 Jagged Peak, Inc., a Nevada corporation,
 21 Debtor.

22 Case No.: BK-S-19-15959-MKN

23 Chapter 11

24 Hearing Date: N/A
 25 Hearing Time: N/A

26 **ATTORNEY INFORMATION SHEET IN SUPPORT OF EX PARTE APPLICATION**
 27 **FOR ORDER SHORTENING TIME TO HEAR FIRST DAY MOTIONS**

28 As required by Local Rule¹ 9006, Mark M. Weisenmiller, Esq. of the law firm of Garman
 1 Turner Gordon, LLP, proposed counsel for Jagged Peak, Inc. ("JPI"), Trade Global North
 2 America Holding, Inc. ("TGNA") and Trade Global LLC ("TG" or, collectively with JPI and
 3 TGNA, the "Debtors"), debtors and debtors-in-possession in the above-captioned proceeding,
 4 has contacted the parties listed below regarding the proposed order shortening time to hear the
 5 following First Day Motions filed on September 17, 2019:

6 (1) *Emergency Motion for Order Directing Joint Administration of Debtors'*
 7 *Chapter 11 Cases Under Federal Rule of Bankruptcy Procedure 1015(b)* (the

8 ¹ Unless otherwise stated, all Chapter and Section references are to Title 11 of the U.S. Code (the "Bankruptcy
 9 Code"); all "Bankruptcy Rule" references are to the Federal Rules of Bankruptcy Procedure; and all references to
 10 "Local Rule" are to the Local Rules of Bankruptcy Practice for the U.S. District Court for the District of Nevada.

1 “Joint Administration Motion”);

2 (2) *Motion of Debtors for An Order granting an Extension of Time to File*
3 *Schedules of Assets and Liabilities, Statements of Financial Affairs and Lists of*
4 *Executory Contracts and Unexpired Leases* (“Schedules Extension Motion”);

5 (3) *Motion of the Debtors for Entry of an Order (I) Authorizing Continued*
6 *Use of Existing Bank Accounts, Business Forms and Purchase Card Program;*
7 *(II) Waiving the Requirements of Section 345(b) on an Interim Basis; and (III)*
8 *Granting Related Relief* (the “Bank Accounts Motion”);

9 (4) *Motion of the Debtors for Entry of Interim and Final Orders Pursuant to*
10 *Sections 105(a) and 366 of the Bankruptcy Code; (I) Prohibiting Utilities*
11 *Companies From Altering, Refusing or Discontinuing Services to, or*
12 *Discriminating Against, the Debtors on Account of Prepetition Amounts Due; (II)*
13 *Deeming Utility Providers Adequately Assurance of Future Performance (III)*
14 *Authorizing the Debtors to Establish the Adequate Assurance Deposit Accounts*
15 *and Pay the Adequate Assurance Depositions; (IV) establishing Procedures for*
16 *Objection to the Adequate Assurance Procedures; and (V) Granting Certain*
17 *Related Relief* (the “Utilities Motion”);

18 (5) *Motion of the Debtors for Entry of Interim and Final Orders (A)*
19 *Authorizing the Debtors to Pay (I) All Prepetition Employee Obligations, and (II)*
20 *Prepetition Withholding Obligations, and (B) Directing Banks to Honor Related*
21 *Transfers* (the “Wages Motion”); and

22 (6) *Debtors’ Application for an Order Approving Employment of BMC*
23 *Group, Inc. as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date*
24 *(the “Notice/Claims Agent Motion,” and collectively with the Joint*
25 *Administration Motion, Schedules Extension Motion, Bank Accounts Motion,*
26 *Utilities Motions, and Wages Motion, the “First Day Motions”).*

27 ...

28 ...

29 ...

30 ...

31 ...

32 ...

33 ...

34 ...

1 The parties listed below agree and disagree to the time being shortened, as indicated
 2 below:

<u>Name</u>	<u>Date Contracted</u>	<u>Agree</u>	<u>Disagree</u>
Robert Klyman, Esq. <i>Counsel for Singapore Post Ltd.</i>	9/17/2019 (by telephone)	X	
Edward M. McDonald, Esq. Office of the United States Trustee	9/17/2019 (by telephone)	X	

7
8 Dated: September 17th, 2019

9 GARMAN TURNER GORDON LLP

10
11 By: /s/ Mark M. Weisenmiller
12 GREGORY E. GARMAN, ESQ.
13 GERALD M. GORDON, ESQ.
14 MARK M. WEISENMILLER, ESQ.
15 650 White Drive, Ste. 100
16 Las Vegas, Nevada 89119

17 COZEN O'CONNOR
18 THOMAS J. FRANCELLA, ESQ.
19 1201 North Market Street, Suite 1001
20 Wilmington, DE 19801

21 *[Proposed] Attorneys for Debtor*